

FILED**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA**

NOV 02 2021

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301**UNITED STATES OF AMERICA,**

v.

Criminal No. 2:21-CR-32 TSK/MJA**NICHOLAS JOSEPH BUONO and
KAYLA LYNN JENKINS,****Defendants.****Violations:** 18 U.S.C. § 922(a)(6)
18 U.S.C. § 922(g)(3)
18 U.S.C. § 924(a)(2)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846**INDICTMENT**

The Grand Jury charges that:

COUNT ONE

(False Statement in Connection with the Acquisition of a Firearm)

On or about July 18, 2019, in Barbour County, in the Northern District of West Virginia, defendant **KAYLA LYNN JENKINS**, in connection with the attempted acquisition of a firearm, that is a Davis Industries, model P-32, semi-automatic .32 ACP caliber pistol, serial number P183248; and a Lorcin Engineering CO., INC., model L-25, .25 ACP caliber semi-automatic pistol, serial number 018552, from a licensed dealer of firearms, did knowingly make a false written statement that was intended and likely to deceive such dealer with respect to a fact material to the lawfulness of the sale of such firearm, that is the defendant **KAYLA LYNN JENKINS** checked the box "no" to the question "Are you an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance" on question 11e of the Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, and there below did sign her name certifying that her answers on the form were true, knowing that her said answer was false; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

(Unlawful Possession of a Firearm)

On or about July 18, 2019, in Barbour County, in the Northern District of West Virginia, defendant **KAYLA LYNN JENKINS**, knowing that she was an unlawful user of and addicted to a controlled substance, that is methamphetamine, a Schedule II controlled substance, did knowingly possess in and affecting interstate commerce firearms, to wit: a Davis Industries, model P-32, semi-automatic .32 ACP caliber pistol, serial number P183248, and a Lorcin Engineering Co., Inc., model L-25, .25 ACP caliber semi-automatic pistol, serial number 018552, in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT THREE

(Conspiracy to Distribute Methamphetamine)

From on or about August 3, 2020, and continuing to on or about April 8, 2021, in Barbour County, in the Northern District of West Virginia, and elsewhere, defendants **NICHOLAS JOSEPH BUONO** and **KAYLA LYNN JENKINS**, did knowingly, intentionally and unlawfully combine, conspire, confederate, agree and have a tacit understanding to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to distribute and possess with intent to distribute methamphetamine, also known as “crystal meth” and “ice,” a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C).

COUNT FOUR

(Distribution of Methamphetamine)

On or about August 3, 2020, in Barbour County, in the Northern District of West Virginia, defendants **NICHOLAS JOSEPH BUONO and KAYLA LYNN JENKINS** did unlawfully, knowingly, intentionally, and without authority distribute methamphetamine, also known as “crystal meth” and “ice,” a Schedule II controlled substance, to a confidential informant in exchange for \$300 in United States currency, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

(False Statement in Connection with the Acquisition of a Firearm)

On or about September 18, 2020, in Barbour County, in the Northern District of West Virginia, defendant **KAYLA LYNN JENKINS**, in connection with the attempted acquisition of a firearm, that is a Doubletap Defense, LLC, model Doubletap Defense 9, 9mm caliber derringer style pistol, serial number DA19855, from a licensed dealer of firearms, did knowingly make a false written statement that was intended and likely to deceive such dealer with respect to a fact material to the lawfulness of the sale of such firearm, that is the defendant **KAYLA LYNN JENKINS** checked the box “no” to the question “Are you an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance” on question 11e of the Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, and there below did sign her name certifying that her answers on the form were true, knowing that her said answer was false; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SIX

(Unlawful Possession of a Firearm)

On or about September 18, 2020, in Barbour County, in the Northern District of West Virginia, defendant **KAYLA LYNN JENKINS**, knowing that she was an unlawful user of and addicted to a controlled substance, that is methamphetamine, a Schedule II controlled substance, did knowingly possess in and affecting interstate commerce a firearm, to wit: a Doubletap Defense, LLC, model Doubletap Defense 9, 9mm caliber derringer style pistol, serial number DA19855, in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT SEVEN

(Distribution of Methamphetamine)

On or about March 26, 2021, in Barbour County, in the Northern District of West Virginia, defendants **NICHOLAS JOSEPH BUONO and KAYLA LYNN JENKINS**, did unlawfully, knowingly, intentionally, and without authority distribute methamphetamine, also known as “crystal meth” and “ice,” a Schedule II controlled substance, to a confidential informant in exchange for \$100 in United States currency, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

(Distribution of Methamphetamine)

On or about April 8, 2021, in Barbour County, in the Northern District of West Virginia, defendants **NICHOLAS JOSEPH BUONO and KAYLA LYNN JENKINS** did unlawfully, knowingly, intentionally, and without authority, distribute methamphetamine, also known as “crystal meth” and “ice,” a Schedule II controlled substance, to a confidential informant in exchange for \$100 in United States currency, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

A true bill,

/s/
Foreperson

/s/
WILLIAM J. IHLENFELD, II
United States Attorney

Brandon S. Flower
Assistant United States Attorney